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VIA ELECTRONIC CASE FILING

March 18, 2025

The Honorable Judge Julien X. Neals
United States District Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street #4015
Newark, New Jersey 07102

Re: The Roman Catholic Diocese of Paterson, New Jersey, et al. v. United States Department of State, et al., Case 2:24-cv-08350-JXN-MAH

Dear Judge Neals:

This Firm acts for Plaintiffs, the Roman Catholic Diocese of Paterson, New Jersey, Father Manuel Alejandro Cuellar Ceballos, Father Regin Nico Dela Cruz Quintos, Father Joemin Kharlo Chong Parinas, Father Armando Diaz Vizcara Jr., and Father Joseph Aguila Mactal (“Plaintiffs”).

On November 11, 2024, Plaintiffs filed with the Court a Motion to Stay All Proceedings Through and Including December 31, 2024 (the “Motion”). ECF No. 18. Defendants, United States Department of State, United States Department of Homeland Security, United States Citizenship and Immigration Services, Antony Blinken, in his official capacity as Secretary of the United States Department of State, Alejandro Mayorkas, in his official capacity as Secretary of the United States Department of Homeland Security, and Ur Mendoza Jaddou, in her official capacity as Director of United States Citizenship and Immigration Services (“Defendants”), did not oppose the Motion. Id.

On December 12, 2024, the Court granted the Motion and ordered a stay of all proceedings up to and including December 31, 2024. ECF No. 19. The Court further ordered the filing of a status report no later than December 16, 2024. Id. The Status Report was filed, and, on December 18, 2024, the Court ordered the filing of a second status report no later than

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December 30, 2024. ECF. Nos. 22, 23. Plaintiffs, after consultation with Counsel for Defendants, submitted a second letter Status Report on December 30, 2024. ECF No. 24. On December 30, 2024, Plaintiffs filed with the Court a Motion to Stay All Proceedings Through and Including March 31, 2025 (the "Motion 2"). ECF No. 25. Defendants did not oppose the Motion. Id. On December 31, 2024, the Court granted Motion 2 and ordered a stay of all proceedings up to and including March 31, 2025. ECF No. 26. The Court further ordered the filing of a status report no later than February 1, 2025, and further stated that if the matter is not settled, a joint status report must be filed every two weeks until the report of the matter as settled, or parties are unable to do so by March 31, 2025. Id.

On January 30, 2025, Plaintiffs, after consultation with Defendants' Counsel, submitted a third Status Report. ECF No. 30. Moreover, on February 17, 2025, after further consultation with Defendants' Counsel, Plaintiffs submitted a fourth letter Status Report. ECF No. 31. Additionally, on March 3, 2025, Plaintiffs, after consultation with Defendants' Counsel, submitted a fifth letter Status Report. ECF No. 33. Plaintiffs, after additional consultation with Defendants' Counsel, now submit a sixth letter Status Report.

Plaintiffs report that as of today, there is no change in the previously reported status. Defendants state that they continue to have no independent knowledge of Plaintiffs' efforts to address their claims outside of this litigation but do not oppose the continued stay of this matter while Plaintiffs pursue these efforts.

Unless the Court otherwise orders, Plaintiffs will file a fifth status report on March 31, 2025. Should a resolution rendering Plaintiffs' Complaint moot occur prior to March 31, 2025, Plaintiffs will so inform the Court.

Very Truly Yours,

LAHOUD LAW GROUP, P.C.



Daniel J. Baurkot, Esquire



Raymond G. Lahoud, Esquire*

**Pro Hac Vice*

DJB:RGL:rc

cc: Counsel for Defendants (via ECF)